

Exhibit H 22

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

U.S. OIL TRADING LLC,)	IN ADMIRALTY
)	
Plaintiff,)	Case No. 3:14-cv-05982-RJB
)	
vs.)	HAPAG-LLOYD'S FIRST REQUESTS
)	FOR PRODUCTION TO PLAINTIFF
M/V VIENNA EXPRESS, her tackle, boilers,)	
apparel, furniture, engines, appurtenances, etc.,)	
<i>in rem</i> , and M/V SOFIA EXPRESS, her tackle,)	
boilers, apparel, furniture, engines,)	
appurtenances, etc., <i>in rem</i> ,)	
)	
Defendants.)	
Hapag-Lloyd Aktiengesellschaft, <i>as claimant</i>)	
<i>to the in rem defendant M/V VIENNA</i>)	
<i>EXPRESS</i> ,)	
)	
Counter-Claimant and Third-Party Plaintiff,)	
)	
vs.)	
)	
U.S. OIL TRADING LLC,)	
)	
Counter-Defendant and)	
O.W. BUNKER GERMANY GMBH, O.W.)	
BUNKER & TRADING A/S, ING BANK)	
N.V., CREDIT AGRICOLE CORPORATE)	
AND INVESTMENT BANK, a division or)	
arm of CREDIT AGRICOLE S.A.,)	
)	
Third-Party Defendants.)	

Case No.: 3:14-CV-05982-RJB
HAPAG-LLOYD'S FIRST REQUESTS FOR PRODUCTION TO
PLAINTIFF - 1

KEESAL, YOUNG & LOGAN
1301 FIFTH AVENUE, SUITE 3300
SEATTLE, WASHINGTON 98101
(206) 622-3790

Counter-Claimant and Third Party Plaintiff, Hapag-Lloyd Aktiengesellschaft by its attorneys Freehill, Hogan & Mahar, hereby demand that Plaintiff, U.S. Oil Trading LLC, produce the following documents in accordance with Rule 34 of the Federal Rules of Civil Procedure within thirty (30) days from the date of service.

DEFINITIONS

1. **"Documents"** means and includes any designated documents or electronically stored information from which information can be obtained either directly or, if necessary, after translation, including, but not limited to: letters, emails, messages, correspondence, communications, telefaxes, memoranda, writings, notes, journals, logs, discs, computer print outs, instant messages, records, contracts, agreements, purchase orders, confirmations, invoices, receipts, payment records, compilations, analyses, tests, samples, reports, shipping documents, bills of lading, brochures, manuals, process or procedure manuals, pamphlets, writings, drawings, graphs, charts, photographs, video, sound recordings, images, and other data or data compilations.

2. **"Hapag"** means Hapag-Lloyd Aktiengesellschaft.

3. **"OWB" or "OWB entity"** means the O.W. Bunker Group and any office, branch office, affiliate or associate of the OWB Group, including but not limited to: O.W. Bunker & Trading A/S (OW Denmark), O.W. Bunker Germany GmbH (OW Germany) and/or O.W. Bunker USA Inc. (OW USA).

4. **"Marine fuel"** means any and all types of bunkers, diesel or other fuels supplied to vessels by USOT.

5. **"USOT"** means U.S. Oil Trading LLC. and/or its representatives and/or agents.

Note: This Request for Documents is made without prejudice to any motion to transfer that may be filed in this action by any party.

DOCUMENTS REQUESTED

1. All communications, correspondence and other documents relating to negotiations and/or formation of any agreement or understanding between USOT and any OWB entity concerning the supply of marine fuel to vessels in the United States.

1 2. All operating agreements, terms and conditions, master contracts or other
2 documents governing or relating to the relationship, agreement or understanding between USOT
3 and any OWB entity for the supply of marine fuel to vessels in the United States from January
4 2013 to December 2014.

5
6 3. All internal guidelines, policies and/or procedures concerning the supply of
7 marine fuel to vessels for any OWB entity from January 2012 to present.

8
9 4. All internal communications, memos, notes, charts, reports, emails and other
10 documents generated by USOT concerning the profitability, loss and/or incentive to supply
11 marine fuel to vessels in the United States for any OWB entity from January 2012 to present.

12
13 5. All documents related to the purchase of marine fuel by USOT for the supply to
14 vessels as directed by any OWB entity from January 2012 to present.

15
16 6. All communications, instructions, confirmations, receipts, invoices, delivery,
17 payment details, wire transfers, banking records and other documents relating to the supply of
18 marine fuel by USOT as directed by any OWB entity to vessels owned or operated by Hapag,
19 including but not limited to the VIENNA EXPRESS and SOFIA EXPRESS, from January 2012
20 to present.

21
22 7. All communications, instructions, confirmations, receipts, invoices, delivery,
23 payment details, wire transfers, banking records and other documents relating to the supply of
24 marine fuel by USOT as directed by any OWB entity to vessels owned or operated by any
25 company other than Hapag from January 2012 to present.

26
27 8. Complete files or folders concerning any vessel to which USOT supplied marine
28 fuel from January 2012 to present.

1 9. All research, credit reports, data and other documents collected or compiled by
2 USOT from January 2012 to present concerning the ownership, chartering and/or financial
3 viability of any vessel and/or its owner or operator used to determine whether to supply marine
4 fuel to vessels for any OWB entity.

5
6 10. All research, credit reports, data and other documents collected or compiled by
7 USOT from January 2012 to present concerning the financial viability of any OWB entity used
8 to determine whether to supply marine fuel to vessels as directed by any OWB entity.

9
10 11. Any USOT terms and conditions and variations thereof applicable to the supply of
11 marine fuel to vessels in the United States from January 2012 to present.

12
13 12. Any bunker delivery receipts issued by USOT for the supply of marine fuel to
14 vessels in the United States from January 2012 to present.

15
16 13. All internal memos, notes, emails and other documents related to the filing of
17 bankruptcy or insolvency by any OWB entity in 2014 and concerns or issues related to payment
18 of invoices issued by USOT.

19
20 14. All documents exchanged between USOT and Crédit Agricole Corporate and
21 Investment Bank (a division of arm or Credit Agricle S.A.) or any related or affiliated company
22 concerning any loan or debt agreement.

23
24 15. All documents exchanged between USOT and ING Bank N.V. or any related or
25 affiliated company concerning any loan or debt agreement.

26
27 16. All internal memos, notes, emails and other documents related to any
28 consideration of actions to be taken by USOT against vessels supplied with marine fuel in

1 relation to the filing of bankruptcy or insolvency by any OWB entity from September 2014 to
2 present.

3
4 17. All internal memos, notes, emails and other documents relating to the arrest or
5 detention of the VIENNA EXPRESS, SOPHIA EXPRESS or any other vessel owned or operated
6 by Hapag.

7
8 18. All documents that support USOT's contention that it supplied fuel to the
9 VIENNA EXPRESS on the order of Hapag.

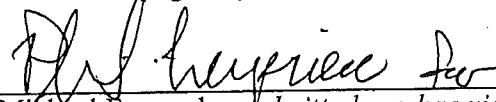
10
11 19. All documents that support USOT's contention that it supplied fuel to the
12 VIENNA EXPRESS on the order of a person or entity authorized by Hapag.

13
14 20. All documents that support USOT's contention that it has a lien against the
15 VIENNA EXPRESS, SOFIA EXPRESS or any other vessel owner or operated by Hapag.

16 DATED this 4th day of June, 2015.

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18 

19 Philip R. Lempriere, WSBA No. 20304
20 Keesal, Young & Logan
21 Attorneys for Counter-Claimant and Third Party
22 Plaintiff Hapag-Lloyd Aktiengesellschaft

23 

24 Michael Fernandez, *admitted pro hac vice*
25 Peter J. Gutowski, *admitted pro hac vice*
26 Freehill, Hogan & Mahar LLP
27 Attorneys for Counter-Claimant and Third Party
28 Plaintiff Hapag-Lloyd Aktiengesellschaft

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that, on the date given below, (he/she) caused to be served a copy of HAPAG-LLOYD'S FIRST REQUESTS FOR PRODUCTION TO PLAINTIFF upon the following person(s) via the following methods:

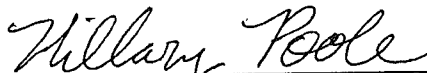
VIA HAND DELIVERY AND U.S. MAIL:

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DATED this 4th day of June, 2015, at Seattle, Washington.


Hillary R. Poole

KYL_SE108051